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December 3, 2004

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: *Unbundled Access to Network Elements; Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers*, WC Docket No. 04-313, CC Docket No. 01-338.

Dear Ms. Salas:

Yesterday, during a telephone conversation with John Stanley of the Office of General Counsel, I discussed the benefits of line sharing in spurring broadband deployment and furthering the Commission's goals under section 706. I also discussed the continuing relevance of Covad's econometric study of the consumer benefits of line sharing submitted in the *Triennial Review* docket.

Respectfully submitted,

/s/

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